

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

WILLIAM J. WAGNER,

Plaintiff,

v.

Civil Action No.1:15-cv-633-FPG

CHIARI & ILECKI, LLP,

Defendant.

**DECLARATION OF KENNETH R. HILLER IN SUPPORT OF PLAINTIFF'S
MOTION FOR EXTENSION OF PAGE LIMIT FOR MEMORANDUM OF LAW IN
SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

I, Kenneth R. Hiller, declare:

1. I am the attorney for the plaintiff in this case.
2. The undersigned has prepared a Motion for Partial Summary Judgment which would like to file.
3. Currently, there is a twenty-five page limit on Plaintiff's memorandum of law in support of such a motion.
6. There have been six depositions in this case, voluminous discovery has been provided to the undersigned by opposing counsel, and the issues involved in this case are complex. The undersigned believes the Plaintiff's arguments cannot be properly set forth in a twenty-five page memorandum.
7. Plaintiff has completed the Memorandum of Law to be submitted with the motion. It is thirty pages in length.
8. I have consulted with opposing counsel who has advised that they have no opposition to the expansion of the page limitation requested herein.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on January 17 2015 in Amherst, New York.

s/Kenneth R. Hiller
Kenneth R. Hiller
Attorney for Plaintiff